

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

CITIBANK, N.A., AS TRUSTEE FOR
AMERICAN HOME MORTGAGE ASSETS
TRUST 2006-3, MORTGAGE BACKED
PASS-THROUGH CERTIFICATES SERIES
2006-3,

Plaintiff,

v.

C.A. No. 1:18-cv-00427-JJM

KATHERINE L. CAITO,

Defendant,

v.

INTERNAL REVENUE SERVICE,

Interested Party.

**PLAINTIFF CITIBANK, N.A., AS TRUSTEE'S MOTION TO EXTEND TIME TO
RESPOND TO DISCOVERY REQUESTS**

Plaintiff, Citibank, N.A., as Trustee for American Home Mortgage Assets Trust 2006-3, Mortgage Backed Pass-Through Certificates Series 2006-3 ("Plaintiff"), requests a court order extending Plaintiff's time to respond to Defendant's Requests for Production, Interrogatories and Requests for Admission served on April 15, 2019 and due May 15, 2019. In support of this motion, Plaintiff presents this request prior to the deadline to respond in accordance with Fed. R. Civ. P. 6(b)(1)(A) and at a time when Plaintiff has separately filed a motion for protective order in relation to the discovery.

WHEREFORE, Plaintiff, Citibank, N.A., as Trustee for American Home Mortgage Assets Trust 2006-3, Mortgage Backed Pass-Through Certificates Series 2006-3, respectfully requests that the Court grant its motion for extension of time to respond to discovery.

Respectfully submitted,

CITIBANK, N.A., AS TRUSTEE FOR
AMERICAN HOME MORTGAGE
ASSETS TRUST 2006-3, MORTGAGE
BACKED PASS-THROUGH
CERTIFICATES SERIES 2006-3,

By Its Attorneys,

/s/ Samuel C. Bodurtha

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Dated: May 2, 2019

CERTIFICATE OF SERVICE

I, Samuel C. Bodurtha, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on May 2, 2019.

/s/ Samuel C. Bodurtha

Samuel C. Bodurtha